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16 Attorneys for Claimants
 17 First 100, LLC, 1st One Hundred Holdings, LLC
 18 and Battle Born Investments Company, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 Approximately 69,370 Bitcoin (BTC), Bitcoin
 23 Gold (BTG), Bitcoin SV (BSV), and Bitcoin
 24 Cash (BCH) seized from
 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

25 Defendant.

26 First 100, LLC, 1st One Hundred Holdings,
 27 LLC, and Battle Born Investments Company,
 28 LLC,

29 Claimants.

Case No. 3:20-cv-07811-RS

**DECLARATION OF MARI SAHAKYAN
 CLIFFORD IN SUPPORT OF
 STIPULATION TO EXTEND TIME TO
 RESPOND TO MOTION TO STRIKE
 THE CLAIMS OF CLAIMANTS BATTLE
 BORN INVESTMENTS COMPANY, LLC,
 FIRST 100, LLC AND 1ST ONE
 HUNDRED HOLDINGS, LLC**

The Hon. Richard Seeborg

Trial Date: None Set

DECLARATION OF MARI SAHAKYAN CLIFFORD

I, Mari Sahakyan Clifford, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an associate with Coblenz Patch Duffy & Bass LLP, attorneys of record for Claimants First 100, LLC, 1st One Hundred Holdings, LLC and Battle Born Investments Company, LLC. I have personal knowledge of the facts stated herein, and if called upon to do so, I could and would personally and competently testify to them.

2. On July 13, 2021, Coblenz Patch Duffy & Bass LLP was retained as counsel by Claimants First 100, LLC, 1st One Hundred Holdings, LLC, and Battle Born Investments Company, LLC (“Claimants”).

3. On July 13, 2021, the same day counsel was retained to represent Claimants, Plaintiff filed a Motion to Strike the Claims of Claimants (hereinafter the “Motion”).

4. On July 15, 2021, Claimants' counsel contacted Plaintiff and asked to meet and confer about the Motion briefing schedule. That same day, counsels held a telephonic conference. At the meeting, Claimants' counsel explained that they were reaching out to request an extension for filing the opposition to the Motion and would offer a similar extension to Plaintiffs to file their reply.

5. The extension for Claimants to file a response is necessary because Claimants' counsel was only recently retained and requires additional time to become acquainted with the facts of the case in order to competently and thoroughly brief its response to the Motion.

6. Later that same day, Plaintiff sent an email offering a two-week extension. Claimants accepted Plaintiff's offer.

7. Counsel has reviewed the case docket and can confirm there have been no previous time modifications in this case relating to Claimants' claims.

8. The requested modifications would have a minimal effect on the schedule of the case as there is currently no Case Management and Scheduling Order in this matter nor a set trial date. The extension does not affect any current deadlines or hearing dates beyond Claimants'

1 deadline to file a response to the Motion, Plaintiff's deadline to file a reply, and an approximately
2 three-week delay of the hearing date.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on this 21st day of July, 2021, at San Francisco, California.

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7 */s/ Mari Sahakyan Clifford*
8 MARI SAHAKYAN CLIFFORD
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